

STATE OF NORTH CAROLINA

IN THE OFFICE OF  
ADMINISTRATIVE HEARINGS

COUNTY OF WAKE

19 OSP 01028

JUDITH KNECHTEGES,

Petitioner,

v.

NORTH CAROLINA DEPARTMENT OF  
PUBLIC SAFETY,

Respondent.

**AFFIDAVIT OF REUBEN YOUNG**

1. I am an adult over the age of eighteen years and competent to provide this Affidavit, which I am making of my own free will, stating facts of which I have personal knowledge.
2. I am currently employed by the State of North Carolina as a judge on the North Carolina Court of Appeals.
3. I was previously employed by the North Carolina Department of Public Safety (the “Department”) as the Interim Chief Deputy Secretary for Adult Corrections and Juvenile Justice.
4. While employed by the Department, I was the hiring manager for the Central Prison Hospital CEO position (“CEO Position”) posted on August 7, 2018.
5. The Department’s human resources staff provided me with seven candidates to interview for the CEO Position. Exhibit 7 to Motion for Summary Judgment.
6. I established an interview panel that consisted of Dr. Anita Wilson—the Medical Director for the Division of Prisons, Annie Harvey—who at the time was the Deputy Director of Operations for the Division of Prisons, and Doug Holbrook—Chief Financial Officer for the Department.

7. After the interviews, the panel provided me with a recommendation to hire Chad Lovett for the CEO Position. Dr. Wilson also provided a memorandum explaining how Mr. Lovett was the most qualified candidate for the position. *See* Exhibit 5 to Motion for Summary Judgment (Dr. Wilson's memorandum).
8. I decided to hire Chad Lovett for the CEO Position. My decision was based on the recommendation from the interview panel for the CEO Position, the application materials for all applicants, and Dr. Wilson's memorandum.
9. I then obtained approval from Secretary Erik Hooks to hire Mr. Lovett for the CEO Position. Mr. Lovett was offered the position and accepted.
10. I did not select Petitioner, Judith Knechtges, for the CEO Position because she was not the most qualified.
11. Petitioner had significantly less experience in hospital administration than Mr. Lovett. *See* Exhibit 5. The Department wanted someone with significant hospital administrative experience because Central Prison Hospital was such an important part of the Department and also because the mismanagement of that facility has the potential to create large liabilities.
12. My decision not to hire Petitioner for the CEO Position was not retaliatory or otherwise based on her reporting of: fraud, violations of law or regulation, misappropriation of State resources, dangers to the public health and safety, gross mismanagement, a gross waste of monies, or gross abuse of authority.

**INTENTIONALLY LEFT BLANK**

This the 19<sup>th</sup> day of July, 2019.

Reuben K. Young  
Reuben Young

Sworn to and subscribed before me this the

19 day of July, 2019.

Cheryl L. Walker  
(Notary Public)

My Commission Expires: 12-10-2020

